

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

INSULATORS AND ASBESTOS)
WORKERS LOCAL NO. 14 PENSION)
FUND, Derivatively on Behalf of 3M)
COMPANY,)

C.A. No. 07-416-GMS

Plaintiff,)

v.)

JURY TRIAL DEMANDED

GEORGE W. BUCKLEY, LINDA G.)
ALVARADO, VANCE D. COFFMAN,)
MICHAEL L. ESKEW, W. JAMES)
FARRELL, HERBERT L. HENKEL,)
EDWARD M. LIDDY, ROBERT S.)
MORRISON, AULANA L. PETERS,)
ROZANNE L. RIDGEWAY, PATRICK D.)
CAMPBELL, MOE S. NOZARI,)
FREDERICK J. PALENSKY, RICHARD)
F. ZIEGLER,)

Defendants,)

and)

3M COMPANY, a Delaware Corporation,)

Nominal Defendant.

DEFENDANTS' MOTION TO TRANSFER TO THE DISTRICT OF MINNESOTA

Defendants Linda G. Alvarado, Vance D. Coffman, Michael L. Eskew, W. James Farrell, Herbert L. Henkel, Edward M. Liddy, Robert S. Morrison, Aulana L. Peters, Rozanne L. Ridgway, George W. Buckley, Patrick D. Campbell, Moe S. Nozari, Frederick J. Palensky, Richard F. Ziegler, and 3M Company (collectively, "Defendants"), move this Court pursuant to 28 U.S.C. § 1404(a) to transfer the captioned action to the United States District Court for the

District of Minnesota, for the reasons set forth in Defendant's Opening Brief in Support of Their Motion to Transfer and the Declaration of Gregg M. Larson filed contemporaneously herewith.

/s/ Philip A. Rovner

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Dated: September 10, 2007

/s/ Steven J. Fineman

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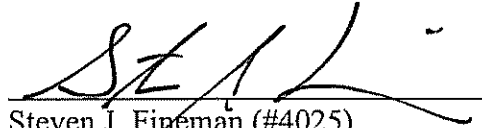
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**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

CERTIFICATE OF SERVICE

I hereby certify that on September 10, 2007, I electronically filed the foregoing document with the Clerk of Court using CM/ECF which will send notification of such filing(s) and Hand Delivered to the following:

Seth D. Rigrodsky, Esquire
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CERTIFICATION PURSUANT TO DISTRICT OF DELAWARE LOCAL RULE 7.1.1

Counsel for Defendants have consulted with counsel for Plaintiff pursuant to District of Delaware Local Rule 7.1.1 and Plaintiff will not consent to the relief sought by this Motion.

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PROPOSED ORDER

The Court, having considered the Motion to Transfer of Defendants and good cause having been shown,

IT IS HEREBY ORDERED this ____ day of _____, 2007 that Defendants' Motion to Transfer is GRANTED and this action is transferred to the United States District Court for the District of Minnesota.

United States District Judge